

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GATSBY FRIMPONG,

Plaintiff,

v.

EVERYREALM INC., REPUBLIC COMPOUND  
LLC, d/b/a REPUBLIC REAL ESTATE, REPUBLIC  
OPERATIONS LLC, d/b/a REPUBLIC, OPENDEAL  
INC., d/b/a REPUBLIC, OPENDEAL PORTAL LLC,  
d/b/a REPUBLIC, JESSE YORIO, in his individual  
and professional capacities, and JANINE YORIO, in  
her individual and professional capacities,

Defendants.

Case No. 22-cv-10487 (GHW)(RWL)

**DEFENDANTS EVERYREALM  
INC. (f/k/a REPUBLIC REALM  
INC.), JANINE YORIO, AND JESSE  
YORIO'S NOTICE OF MOTION TO  
DISMISS, OR, IN THE  
ALTERNATIVE, MOTION FOR  
SUMMARY JUDGMENT**

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**PLEASE TAKE NOTICE THAT** Defendants Everyrealm Inc., Janine Yorio, and Jesse Yorio (collectively “the Everyrealm Defendants”) shall, upon Plaintiff Gatsby Frimpong’s (“Plaintiff”) Complaint; the Declaration of Janine Yorio, and the exhibits attached thereto; the Declaration of Jesse Yorio, and the exhibits attached thereto; and the Everyrealm Defendants’ Memorandum of Law; all filed herewith, move this Court, at Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on such date and time as the Court may direct, for an Order pursuant to Federal Rules of Civil Procedure (“FRCP”) 12(b)(6) dismissing Plaintiff’s sexual harassment claims and any purportedly related thereto against the Everyrealm Defendants because Plaintiff has failed to state a claim upon which relief can be granted.

Dated: New York, New York  
February 8, 2023

PROSKAUER ROSE LLP

By: /s/ Lloyd B. Chinn

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